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Attorneys for Defendant

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ALASKA

EQUAL EMPLOYMENT
OPPORTUNITY COMMISSION,

Plaintiff,

and

SHOTSAY POSCIRI,

Plaintiff-Intervenor,

vs.

UNITED FREIGHT AND TRANSPORT,
INC.,

Defendant.

DOCKETED

Case No. A05-0122 CV (JWS)

**DEFENDANT'S ANSWERS AND RESPONSES TO EEOC'S SECOND
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT**

United Freight and Transport, Inc. ("United Freight"), by and through its attorneys
Dorsey & Whitney LLP, hereby answers and responds to EEOC's Second Set of
Interrogatories and Requests for Production of Documents to Defendant United Freight
and Transport, Inc. as follows:

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responds as follows: No documents have been withheld on the grounds of privilege. United Freight nonetheless produces the most recent version of its privilege log.

REQUEST FOR PRODUCTION NO. 6: Produce all documents relating to the total number of full-time and part-time employees employed by defendant, including all of its subsidiaries and subdivisions, who worked at least 20 weeks during calendar years 2003, 2004 and 2005.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6: Objection. Vague and ambiguous. Objection. Overbroad and overly burdensome. Without waiving these objections, United Freight hereby produces documents numbered UFT 03598-3625. Portions of these documents have been redacted for privacy reasons. The redacted material is not relevant to the subject matter of the request or this suit and is not likely to lead to admissible evidence.

REQUEST FOR PRODUCTION NO. 7: Produce copies of defendant's certified financial statements, both annual and quarterly, since January 1, 2003 to the present. If no such documents exist, produce sufficient documentary evidence showing defendants' accounts receivable and accounts payable on a monthly basis from January 1, 2003 to the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7: Objection. Overbroad and Overly burdensome. Objection. Documents responsive to this request are not relevant, likely to lead to admissible evidence, or discoverable at this time.

REQUEST FOR PRODUCTION NO. 8: Produce copies of defendants' federal and state income tax returns for 2003 through present. If defendant's 2005 income tax returns are not available, then produce copies of defendant's estimated tax return.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8: Objection. United Freight is not required to create documents in response to a request for production. Objection. Documents responsive to this request are not relevant, likely to lead to admissible evidence, or discoverable at this time.

REQUEST FOR PRODUCTION NO. 9: Produce all documents necessary to ascertain the following from January 1, 2003 to the present:

- (1) the gross revenues of defendant's business;
- (2) the liabilities of the business;
- (3) the net profit of the business;
- (4) the fair market value of defendant's assets;
- (5) the amount of liquid assets on hand, which includes amounts that can be reasonably borrowed;
- (6) the resale value of the business;
- (7) the number of people employed for each calendar year from January 1, 2003 to the present.

RESPONSE TO REQUEST FOR PRODUCTION NO. 9: Objection. Overbroad and overly burdensome. Objection. Documents responsive to items (1) through (6) are not relevant, likely to lead to admissible evidence, or discoverable at this time. Without waiving these objections, United Freight responds as follows: all documents responsive

DEFENDANT'S ANSWERS AND RESPONSES TO EEOC'S
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO DEFENDANT

Page 6 of 7

*EEOC et al. v. United Freight &
Transport, Inc.*
Case No. A053-0122 CV (JWS)

EXHIBIT H
Page 3 of 4

to item (7) have previously been produced by United Freight; United Freight is not aware of any other documents responsive to this request.

DATED this 1st day of February, 2006, at Anchorage, Alaska.

DORSEY & WHITNEY LLP
Attorneys for Defendant

By: Wendy E. Leukuma
William J. Evans, ABA #9812092
Wendy E. Leukuma, ABA #0211048

CERTIFICATE OF SERVICE

This certifies that on this 1st day of February, 2006, a true and correct copy of the foregoing document was served on the following:

Teri Healy (via first-class mail)
Equal Employment Opportunity Commission
Seattle District Office
909 1st Avenue, Suite 400
Seattle, Washington 98104

Kenneth W. Legacki (via hand-delivery)
425 G Street, Suite 920
Anchorage, Alaska 99501

Melissa Chana
Certification signature

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DEFENDANT'S ANSWERS AND RESPONSES TO EEOC'S
SECOND INTERROGATORIES AND REQUESTS FOR
PRODUCTION TO DEFENDANT

Page 7 of 7

EXHIBIT 14
Page 4 of 4

*EEOC et al. v. United Freight &
Transport, Inc.*
Case No. A053-0122 CV (JWS)